MNsure®

Where you choose health coverage

MNsure Annual Report 2014

January 15, 2015

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Mission and Vision

Mission: To ensure all Minnesotans have the security of health insurance.

Vision: To create a statewide resource that provides access to private health insurance and public medical assistance programs.

Executive Summary

Requirements

Minn. Stat. §62V.08 (a) requires MNsure to submit an annual report to the legislature by January 15 of each year beginning January 15, 2015, on (1) the performance of MNsure operations; (2) meeting MNsure responsibilities; (3) an accounting of MNsure budget activities; (4) practices and procedures that have been implemented to ensure compliance with data practices laws, and a description of any violations of data practices laws or procedures; and (5) the effectiveness of the outreach and implementation activities of MNsure in reducing the rate of uninsurance.

MNsure's inaugural report satisfies the above statutory requirements as well as provides overview of MNsure's programmatic structure, budget and strategies that MNsure has employed to meet its responsibilities under the law to reduce the uninsured in Minnesota.

Meeting Our Mission: More Minnesotans Insured

MNsure has and continues to meet its mission and responsibilities under the law. According to an independent report produced by the University of Minnesota, implementation of MNsure and the Affordable Care Act in Minnesota led to a 40 percent drop in the number of uninsured. As a result, more than 95 percent of Minnesotans are now insured in comprehensive, affordable health coverage. All plans sold on MNsure include free preventative care and both prescription drugs and hospitalization are covered.

System is Stable

In the spring of 2014, MNsure leadership commissioned an end-to-end review of the MNsure system. Based upon the recommendations by Optum Health, MNsure identified system flaws, improved the governance structure and hired Deloitte Consulting as the lead vendor to manage and implement system improvements. Operations and IT staff have been working tirelessly over the last year to make improvements to provide consumers a better experience. As a result, the MNsure IT system is more stable and operating faster for the 2015 open enrollment period. While website functionality has improved dramatically, MNsure plans to make additional investments in the coming year to further improve the user experience.

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Improved Consumer Experience

The MNsure Contact Center is ready to assist consumers wherever they are and MNsure's advertising and marketing plans are well coordinated and laser-focused on getting people insured. These are just two examples of ways MNsure has focused on improving the consumer experience. Dedicated outreach staff are all across the state to connect consumers with any one of the thousands of brokers and agents and navigators. More robust website tools are helping consumers find enrollment assistance.

Stakeholder Relations are Strong

MNsure has also taken steps to prioritize relationships with stakeholders. Dedicated phone service lines for MNsure brokers, agents and navigators are newly available. The consumer advisory committee and the industry advisory committee to the MNsure board, `which are made up of industry and community stakeholders, have met twenty-eight times and have been hard at work for the past year. Input from these groups has been and continues to be important as MNsure matures.

Accountability and Transparency Will Continue

MNsure is meeting its mission and making a difference in the lives of Minnesotans. The MNsure website is safe, secure and successful. More than 95 percent of Minnesotans are now insured, which is the highest number of insured in state history. As MNsure works to continue to meet its mission, transparency, accountability and a continued focus on the consumer will be its guiding principles.

MNsure is in the midst of the 2015 Open Enrollment Period, which began on November 15, 2014, and ends February 15, 2015. MNsure's open enrollment launch on November 15 was a success. MNsure was operationally ready. Call wait times were between one and five minutes in the first three days of open enrollment. More than 1,500 people enrolled in commercial insurance in the first five days of the 2015 open enrollment period, which is in contrast to 406 commercial enrollees during the first two weeks of the 2014 open enrollment.

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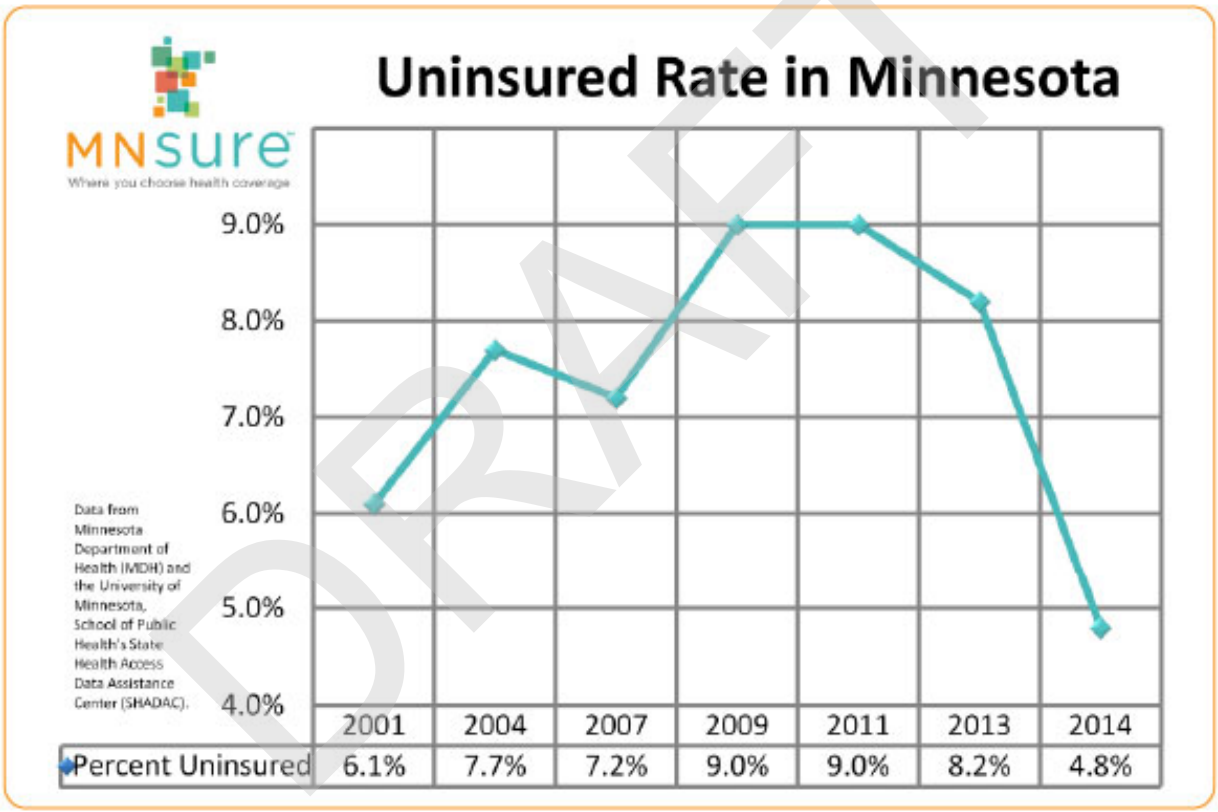
Uninsured Rate Lowest in State History

In June 2014, the State Health Access Data Assistance Center (SHADAC) at the University of Minnesota published "Early Impacts of the Affordable Care Act on Health Insurance Coverage in Minnesota" (http://www.shadac.org/MinnesotaCoverageReport). The purpose of the report was to estimate the early impact of the Affordable Care Act on the number of uninsured in the state. The results were historic.

This report showed between September 30, 2013, and May 1, 2014, the number of uninsured Minnesotans fell by 180,500, a reduction of 40.6 percent. The number of uninsured in Minnesota fell from 445,000 (8.2 percent of the population) to about 264,500 (4.8 percent of the population), the lowest in Minnesota's history and one of the lowest in the nation.



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Enrollment Snapshot

2014 Open Enrollment

During MNsure's first enrollment cycle, October 1, 2013, to November 14, 2014, 371,935 Minnesotans enrolled in quality, affordable health insurance coverage through MNsure. This includes 55,900 qualified health plan enrollments, 80,602 MinnesotaCare enrollments and 235,433 Medical Assistance enrollments.

The 2014 open enrollment period was October 1, 2013, to March 31, 2014. During this time, all Minnesotans could enroll in a qualified health plan. From April 1 to November 14, 2014, Minnesotans needed a qualifying life event to enroll in a qualified health plan. Enrollment in MinnesotaCare and Medical Assistance is available year-round.

2015 Open Enrollment

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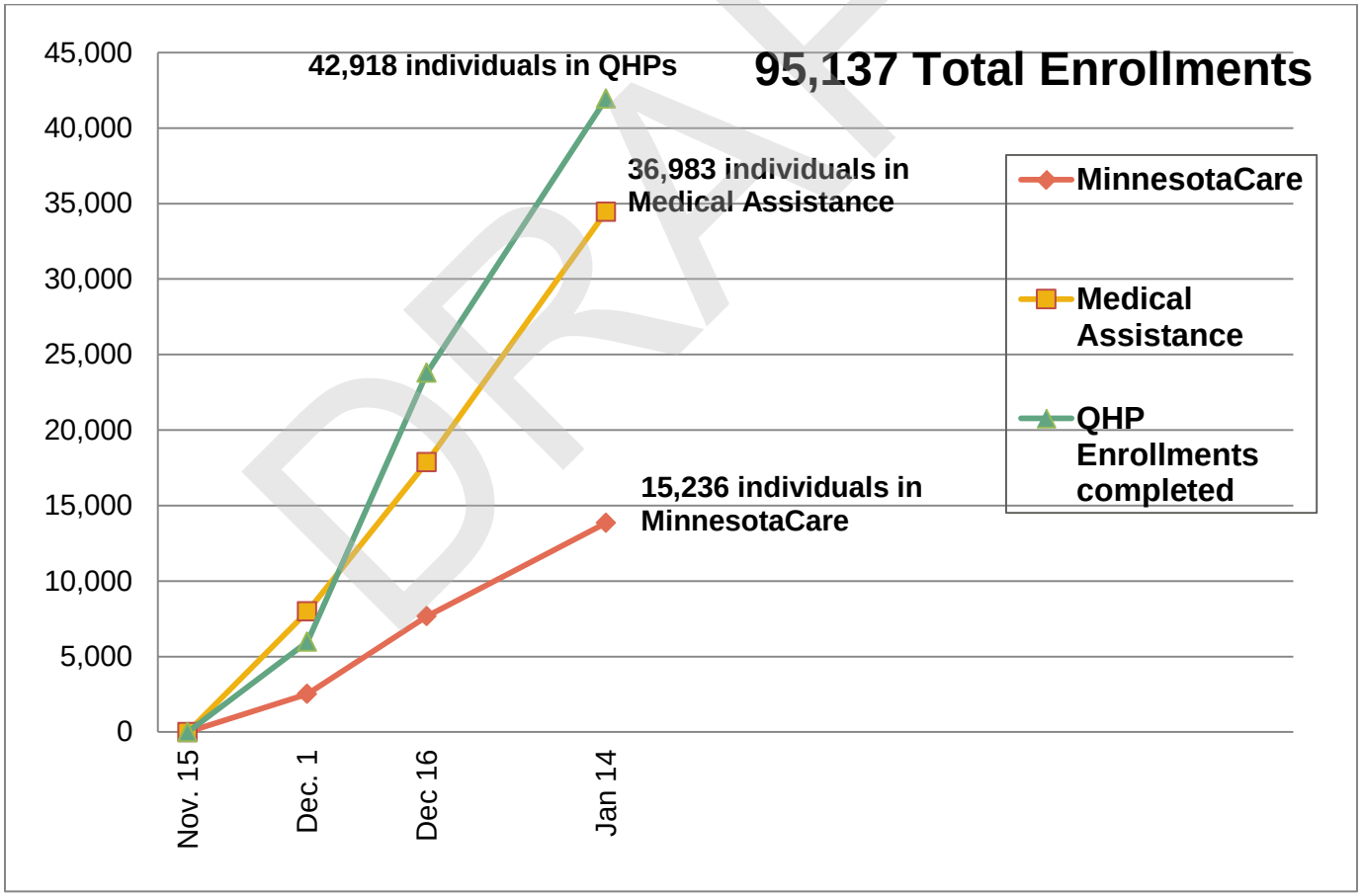
As of January 15, 2015, MNsure has enrolled 95,137 Minnesotans into health insurance coverage. This includes 42,918 qualified health plan enrollments, 15,236 MinnesotaCare enrollments and 36,983 Medical Assistance enrollments.



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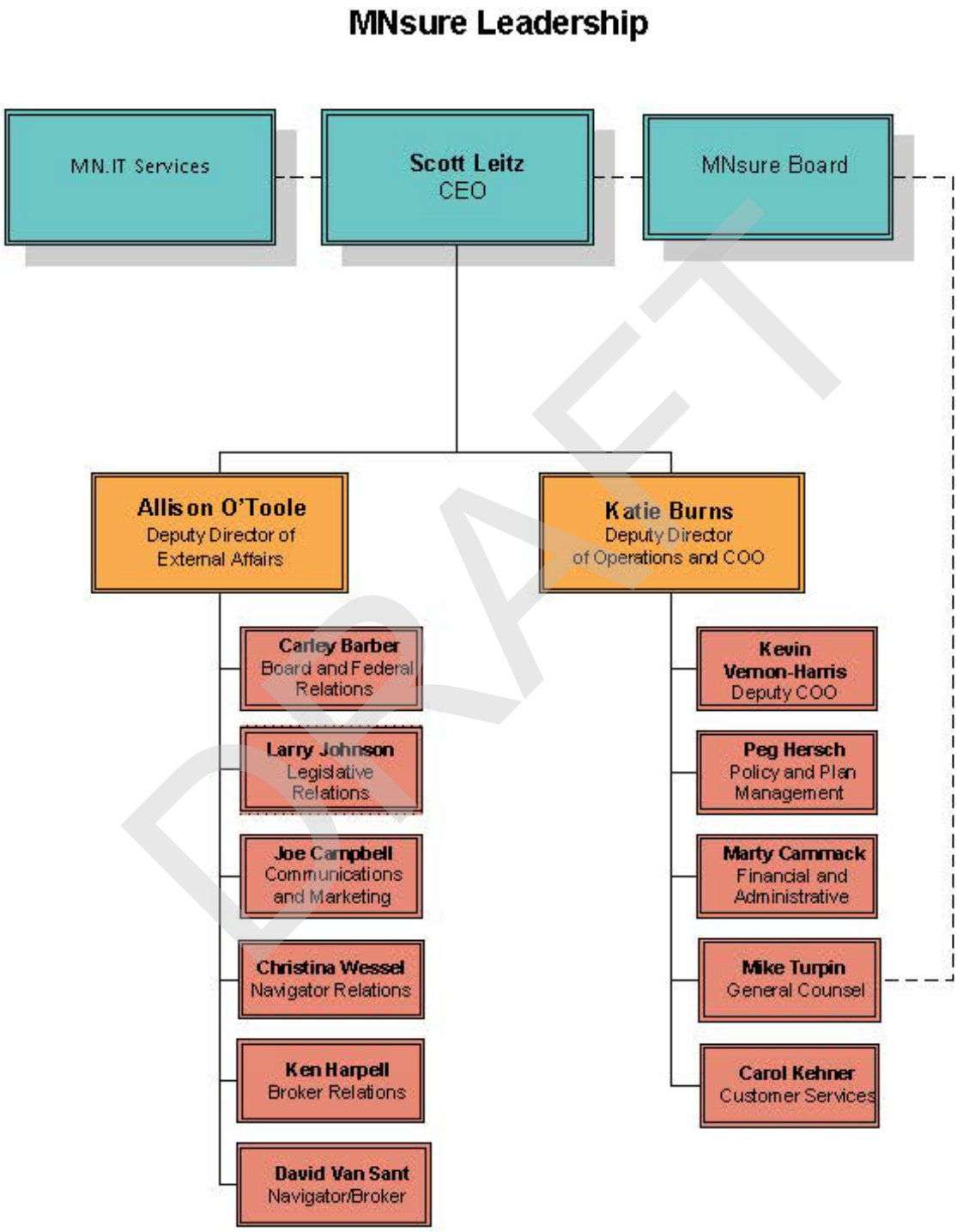
MNsure Organizational Chart



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Improving the Customer Experience

Website Stability

The MNsure system has seen vast improvements in terms of system stability. Minnesotans are able to access MNsure.org without many of the problems or errors they may have experienced during the first open enrollment period. The infrastructure behind the MNsure system has also improved, allowing more Minnesotans to be logged into the system at one time without creating overload issues. MNsure continues to make improvements to system stability as needs evolve.

Strengthening Stakeholder Relations

MNsure is focused on fostering two-way communication with its partners. MNsure staff meets with stakeholder groups regularly to share ideas. This impact is critical as MNsure continues to improve.

Certification and Support for Partners

The Navigator/Agent/Broker (NAB) Program certifies and monitors MNsure's assisters, which are made up of navigators, agents, brokers and certified application counselors. Assisters must be certified by MNsure. Certification involves system training, data privacy training and a background study. More than 200 navigator organizations representing more than 1,900 individuals are contracted to provide application and enrollment assistance, along with more than 900 licensed agents and brokers.

The NAB program also develops and administers training programs for assister organizations. Performance support sessions include 100-minute sessions on basic eligibility for public programs, household income and composition, immigration considerations, application assistance start to finish, qualified health plan selection and tax implications.

Broker Support

Specific outreach and operational upgrades have been made to accommodate insurance agents and brokers. MNsure has engaged in ongoing dialogue and communication around best practices, new procedures and suggestions for improvement. Agents, brokers and MNsure staff meet monthly to discuss the steps MNsure is taking to enhance the consumer, agent and enrollment experience. MNsure has developed an interactive website that includes agency self-service, calendar of events and useful information and has built out a specialized customer service broker team. Eight experienced contact center staff will serve brokers and agents directly that includes enhanced certification support, streamlined access to client status, direct access to manual enrollments and renewals on behalf of clients and reorganized SHOP enrollment process. Brokers and agents can also provide feedback and ask questions via brokers@mnsure.org. Questions will be reviewed, answered and made available on the site. MNsure has also convened five broker/agent forums in key locations throughout the state to answer questions and address the improvements being made for the

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upcoming open enrollment by MNsure. Lastly, MNsure has engaged six insurance agencies around the state to serve as lead agencies. Such agencies will receive marketing support from MNsure and additional resources to enroll individuals through MNsure.

Navigator Support

MNsure is working to increase support for navigators as well. This includes hosting performance support events around the state and providing administrative support in promoting events and responding to policy questions. MNsure is facilitating discussions with navigators and other state agencies to build relationships and open communication. Navigators can also access the enhanced Assister Resource Center, which is a specialized customer service for navigators. The Assister Resource Center provides assistance with enhanced certification support, streamlined access to client status and direct access to manual enrollments, password resets and renewals on behalf of clients.

Strengthening the Community Grants Program

The NAB program also operates the Outreach and Infrastructure Grant Program, which is a competitive grant program for navigators and brokers to perform outreach and build organizational infrastructure. In 2013-14, MNsure awarded approximately $4.7 million through 41 grants to trusted community organizations focused on reaching and enrolling hard-to-reach, non-English speaking, geographically isolated, vulnerable, and underserved consumers. For 2015, the $4.58 million grant program funds more than 80 organizations through 28 grants. The grants are assisting populations facing barriers to coverage with enrollment and renewal through MNsure, building regional navigator resource and referral networks to reach and enroll Minnesotans, and finding, connecting with and educating uninsured Minnesotans about health care coverage available through MNsure.

Thirteen grants focus on consumers facing particular challenges to enrolling in or renewing coverage, or populations with high levels of uninsurance. Thirteen grants focus on racial and ethnic communities, recognizing that these populations often experience greater health inequities even after adjusting for factors such as income and geography. Two grants support regional navigator network pilots using collaborative and innovative strategies.

Building Robust Customer Service

Since January 2014, MNsure has built out its customer service operations and now provides a number of ways consumers can receive assistance. For many consumers, the MNsure Contact Center toll-free hotline is their first stop and the issue is usually resolved in the first call. The number of calls to the MNsure Contact Center has dramatically increased, due to the fact that MNsure is able to handle more calls. This means more people are getting questions answered and fewer people are sitting on hold without assistance.

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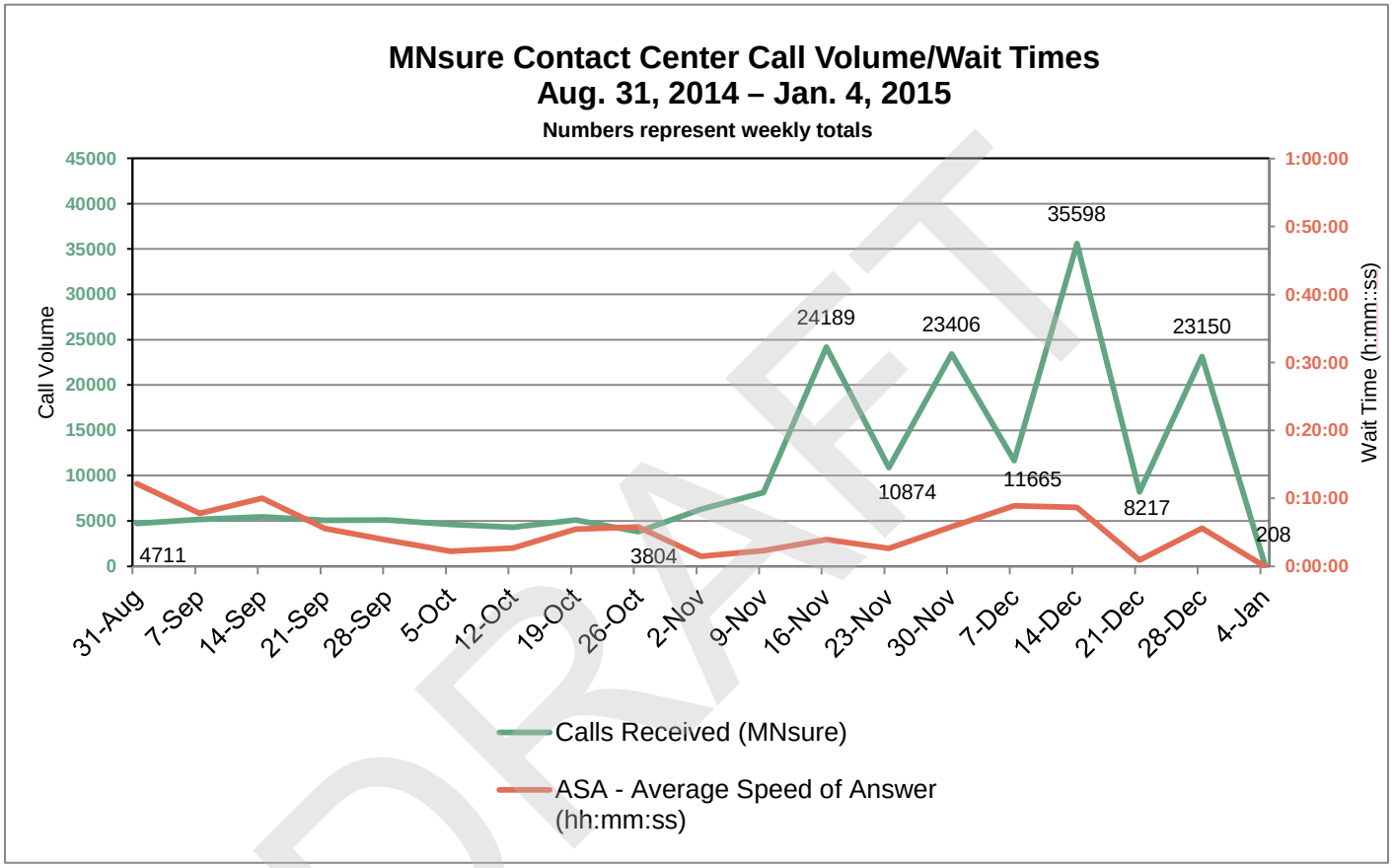
The following chart shows that even with a record number of incoming calls to the MNsure Contact Center during this open enrollment period, call wait times remain very low. The number of calls began to increase dramatically the week of November 9, 2014, and continued at a high volume until January 4, 2015. MNsure received 35,598 calls the week of December 14, 2014, the highest volume for this open enrollment period so far. That week, average hold times remained under 10 minutes.



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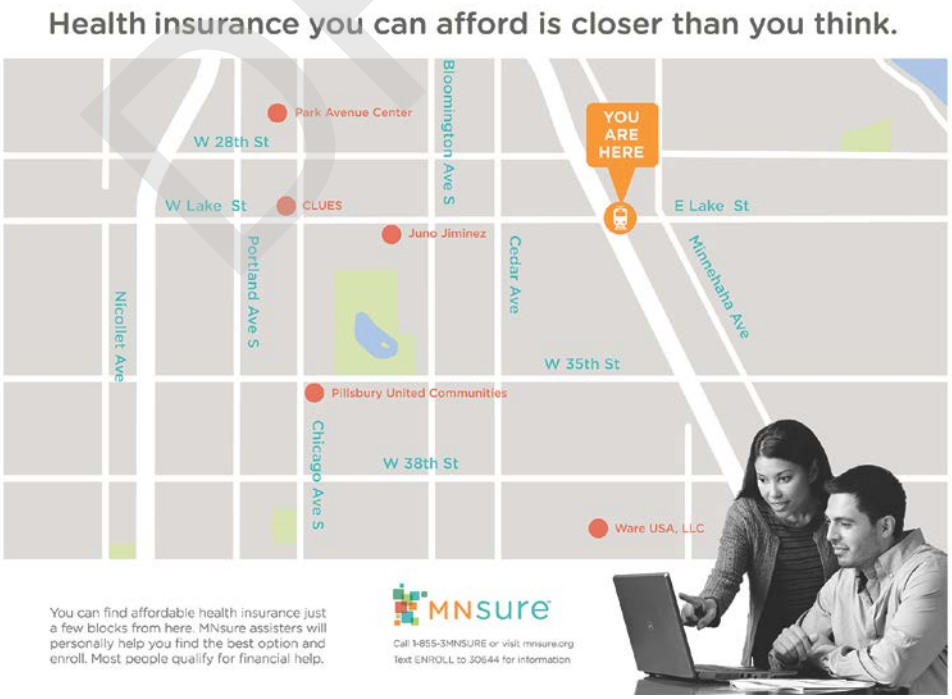
MNsure's customer service online is also more robust. Dedicated digital media staff responds to inquiries via Twitter and Facebook as well as the general customer service email inbox. For many consumers, interaction through digital media has produced quick, real-time assistance.

Reaching Out to Consumers

Advertising

The 2014 open enrollment period marketing and outreach campaign was focused on awareness and establishing the framework for a grassroots outreach plan. The latter half of the 2014 open enrollment moved from an awareness campaign to an enrollment push with the launch of March to Enroll during March 2014. MNsure transitioned to testimonial style ads and began coordinating enrollment events to drive enrollment.

For the 2015 open enrollment period, the MNsure marketing efforts are squarely focused on enrollment. The plan features statewide TV and radio ads in addition to billboards and out-of-home placements at transit stops across Minnesota. MNsure is also leveraging digital advertising to reach diverse audiences and focus on affordability and enrollment help.



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Grassroots Outreach

In addition to traditional advertising, MNsure began a grassroots outreach campaign. The outreach effort supports, connects and creates networks of MNsure partners and identifies opportunities to enroll the traditionally hard-to-reach uninsured, young invincibles and re-enrollees.

Throughout open enrollment, MNsure's outreach has focused on specific populations of Minnesotans through "theme weeks." These weeks include targeted outreach to women, young invincibles and families with children. MNsure is also capitalizing on relationships with community partners to provide theme weeks focusing on wellness, community colleges and social justice organizations.

Statewide Enrollment Centers

For the 2015 open enrollment period, MNsure launched a pilot program with six certified broker agencies. These walk-in "enrollment centers" provide free, in-person enrollment assistance without the need to make an appointment. Minnesotans who are not sure if they qualify for financial help can use these enrollment centers to determine the best in-person assistance for them. These enrollment centers are located in Woodbury, Austin, Roseville, Waconia, Willmar and Bloomington. As of January 15, 2015, more than 1,000 consumers have enrolled through these enrollment centers.

Digital Outreach

MNsure's outreach campaign is highly digital and includes a robust online calendar of enrollment opportunities throughout Minnesota and the "Make a Plan" application to direct individuals to in-person assistance. Minnesotans can also text ENROLL to 30644 to receive text message reminders throughout open enrollment. Email messages reminding Minnesotans to complete their enrollment or confirm their enrollment are also being sent to thousands of people each week.

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MNsure Business Operations

MNsure operations develops and executes the processes for qualified health plan eligibility and enrollment, reporting, plan data transfer, special enrollment periods, Small Business Health Options (SHOP), customer service, compliance and finance.

Policy & Plan Management, Eligibility & Enrollment, Program Management Office

The Policy and Plan Management Team is the primary point of contact for health insurance companies offering products on MNsure, with a focus on data reporting, quality control for MNsure products and the consumer shopping experience. This team also works closely with health insurance companies and interagency regulatory colleagues to ensure MNsure policies are aligned in support of health reform objectives and corresponding operational requirements of our partners.

The Eligibility and Enrollment Team is responsible for establishing and monitoring the business rules for the eligibility software such that they are consistent with state and federal law. Eligibility and Enrollment staff also reviews special enrollment cases.

The MNsure Business Project Management Office (BPMO) provides project and portfolio management services to MNsure for the purpose of driving success of MNsure's initiatives and helping MNsure achieve its goals.

Services include:

Portfolio Management:

- Manage Stakeholder Value Dashboard
- Manage Program/Project intake
- Work with MNsure leadership to prioritize the work of the organization

Program and Project Delivery

- Provide Project Managers and Business System Analysts to implement programs and projects
- Administer cross agency interdependencies
- Establish incentives/systems to deliver projects faster or with higher quality
- Monitor Program/Project progress
- Provide a central repository for programs/projects
- Build project management skills among MNsure staff

Enterprise-wide Training

- Coordinate enterprise-wide instructional design/training coordination

Finance and Administrative

The Finance team is responsible for providing accounting services and financial support to MNsure. The Finance department records accounts payable and receivable and inventory including certain fixed assets. Human resources services are performed by staff at the Minnesota Department of Human Services via interagency agreement.

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MNsure's budget cycle tracks the State of Minnesota fiscal year. The MNsure Board, in collaboration with executive leadership, approves the MNsure budget. The MNsure board adopted the FY2015 budget on October 15, 2014 (https://www.mnsure.org/images/bd-2014-10-15-budget-pres.pdf). The budget for FY2016 is due to the legislature on March 15, 2015.

MNsure was awarded a federal grant adjustment of $34 million by The Center for Consumer Information and Insurance Oversight (CCIIO), a division of the Centers for Medicare and Medicaid Services. The new funding, awarded on December 22, 2014, will accelerate the IT development of MNsure.org, as well as enhance consumer assistance during this extended period of the IT project build. The FY2015 budget will be adjusted in January.

MNsure's total federal investment is now $189,363,527, making it the fourth-most-affordable state-based marketplace in the country. MNsure is also the only state-based marketplace that determines eligibility for qualified health plans, Medicaid and a state basic health plan, making the technology needs of MNsure unique to any other state or federal marketplace.

Legal and Compliance

The Legal and Compliance team is responsible for the compliance with all applicable law, rules and regulations, identifies and mitigates organizational risk, reviews contract and procurement, plans and executes internal controls and advises MNsure on legal matters.

Consistent with its oversight and monitoring obligations under state and federal law, MNsure has taken significant steps since its inception to develop and implement a comprehensive compliance program. In early 2014, MNsure initiated a solicitation for a vendor to assist MNsure in the assessment of its current compliance activities, as well as to assist in a strategic plan and implementation roadmap for an ongoing compliance program. The vendor began assisting MNsure in late summer of 2014 and concluded its work in December of 2014. Based on this assistance, MNsure staff developed a draft compliance program strategic plan that was presented to the MNsure Board for approval at the MNsure Board meeting on December 17, 2014. At this meeting, the MNsure Board formally approved the MNsure Compliance Program Strategic Plan (http://www.mnsure.org/images/bd-2014-12-17-compliance-program-strategic-plan-final.pdf), including an implementation roadmap. Implementation of the compliance program according to this strategic plan and roadmap is underway and will contribute greatly to MNsure fulfilling its oversight and monitoring obligations under state and federal law.

Data Practices

MNsure has a responsibility under state and federal law to protect and ensure the privacy of personally identifiable information and other private or nonpublic data. MNsure has established a comprehensive Privacy Policy (https://www.mnsure.org/resources/terms-conditions.jsp) outlining the collection, use,

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disposal and sharing of protected information. This policy informs the public on how their information is used within the agency when they apply for health insurance coverage or otherwise do business with MNsure.

MNsure has also conducted a top-to-bottom security review to ensure protection of information maintained by the agency in all formats. This security review includes information technology such as encryption and firewalls, audit logging and vulnerability scanning, as well as other types of security controls such as access authorization and management, training compliance and physical storage security. The system is architected due to stated business and regulatory requirements with appropriate risk-reducing technical controls that ensure integrity, checks, logging and failover mechanisms.

To ensure compliance with data practices laws and information protection standards for employees and contractors handling private data, there exist several internal policies and procedures. MNsure has adopted the Department of Human Services Information and Technology policies, except that where the policies conflict with any existing MNsure administrative policies or procedures, the MNsure policies or procedures shall govern. MNsure employees and contractors are also required to take privacy and security training courses, which were recently revised by DHS. The new courses include: Data Security and Privacy, Managing Information Security Problems, How to Protect Information, Protected Health Information, Federal Tax Information and Social Security Administration Information.

As part of its certification through the Center for Medicaid Services (CMS), MNsure has also entered into agreements outlining the procedures and responsibilities for compliance with privacy and security laws and standards. The Privacy Impact Assessment identifies and documents the specific types of sensitive information that is collected, processed and stored by MNsure. This assessment is in conjunction with data inventories for business units and administrative policies.

Privacy and Security Functions

Consent

Anyone supplying information to MNsure as part of an application for eligibility is asked to consent prior to the collection of their private data and shall be informed of: (a) the purpose and intended use of the requested data within the collecting government entity; (b) whether the individual may refuse or is legally required to supply the requested data; (c) any known consequence arising from supplying or refusing to supply private or confidential data; and (d) the identity of other persons or entities authorized by state or federal law to receive the data.

Users acknowledge consent to proceed with information collection and consent to comply with the rules of behavior for system access at initial account creation. Throughout the application, MNsure provides Tennessen warnings for any information collected, and the individual agrees and accepts to move forward or declines if they do not agree with the data collection described. For paper applications, a Notice of Privacy Practices describes the use, collection and consent for disclosure of private data. Also,

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for collection on the phone to the Contact Center, a recording or contact center operator provides oral Tennessen warnings, and the individual may opt in or opt out. The Privacy Policy, Terms of Use and Tennessen warnings are also publicly available and printable on the MNsure website.

An individual may revoke consent by submitting a written request to the Privacy and Security Manager.

Data Challenge

If an individual who is the subject of private data concludes, after viewing the data, that the data is inaccurate or incomplete, the individual may file a lawsuit or may file a challenge regarding the accuracy and completeness of the data.

To file a challenge to the accuracy or completeness of the data, the individual must write to the Privacy & Security Manager and include a description of the nature of the disagreement. If the Privacy & Security Manager requires more information to determine whether the data are accurate or complete, he/she may contact the individual for clarification. The Privacy & Security Manager must review the data and the complaint and respond within the timelines set forth in Minnesota Statutes, section 13.04, subdivision 4.

If the Privacy & Security Manager agrees the data in question is inaccurate or incomplete, he/she must correct the data and make reasonable efforts to notify past recipients of the data about the data corrections. If the Privacy & Security Manager is convinced that the contested data is accurate and complete, he/she must inform the individual of this conclusion. If the Privacy & Security Manager decides that disputed data is accurate and complete and the individual still disagrees, the individual may file an administrative appeal to the Minnesota Department of Administration as set forth in Minnesota Statutes, section 13.04, subdivision 4, and Minnesota Rules 1205.1600.

Access by Employees

Employee and contractor access to private data is limited by position description and minimum necessary access controls. MNsure has also employed security safeguards such as separation of duties and physical controls to limit exposure to private data for anyone who does not have a business reason for access to specific data. These controls include system access management, secure buildings and equipment, instructions for proper handling and disposal of data in all forms and appropriate personnel consequences for a violation.

Each request for access to private data maintained in MNsure systems is determined on a case-by-case basis. An employee's supervisor, or a contractor's employee sponsor, evaluates the employee's/contractor's necessary job duties and the minimum access required to accomplish such duties. The supervisor/employee sponsor submits a request for the minimum necessary access (least privilege) for the employee/contractor to the MNsure Privacy and Security manager, who verifies successful completion of a background check and privacy and security training.

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The MNsure Board or delegated authority reviews each request on a case-by-case basis to approve or deny the access request. Access by privileged users to an individual's private data such as case file and eligibility factors is also tracked and the data contained in audit trail logs.

Data Practices Requests

Anyone may request data from MNsure for any reason, including individual data subjects and members of the public. Requests are made in writing by filling out an online form, contacting the Privacy and Security Manager or emailing the MNsure Data Requests mailbox.

MNsure has handled more than 100 separate requests for public data, many of which involve several subparts and voluminous responsive data. The responsive data totals more than 30 GB in size, and MNsure has produced more than 10 GB to requestors. Industry standards for document review indicate that one GB of data is equivalent to 10,000 documents and 200 hours of staff time to review and produce.

The majority of requests come from media outlets, followed by organizations and Minnesota Legislators and staffers. MNsure is committed to government transparency and makes publicly available its contracts, RFPs, grant awards, board meeting materials, federal certification milestones and other information on the website. (https://www.mnsure.org/about-us/rfp-contract/)

Incident Response Process

MNsure staff and contractors receive informational advisories and training regarding security and privacy incidents. Staff are required to immediately report potential security or privacy incidents or breaches, and MNsure convenes an incident response team to evaluate the necessary criteria to determine the level of notification. Furthermore, data-sharing agreements with outside partners to whom private data is sent or received also include obligations to immediately notify of any security or privacy incidents. Incidents are handled in accordance with established policy and include communication with executive leadership, legal staff, public relations staff, external partners and IT providers.

MNsure has investigated approximately 28 instances of potential security or privacy breaches. The majority of these incidents involved an unintended electronic disclosure such as sending an email to the incorrect recipient, while others were not in fact an error or privacy or security incident. The remaining incidents involved potential malware, coding issues and system operations at the initial launch, and mailing errors for bulk mailings.

In each instance, an investigation was conducted and the issue resolved. Additionally, measures were considered and put into place as necessary in order to prevent and mitigate any same or similar issue from occurring in the future.

Data Sharing

MNsure is limited in disclosing protected information unless the individual provides informed consent in an authorization or such disclosure is provided by law. MNsure's governing statute allows for data sharing according to a court order, where specifically

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authorized by state or federal law, to the subject of the data, or only to the extent necessary to verify the identity of, determine the eligibility of, process premiums for, process enrollment of, or investigate fraud related to an individual, employer, or employee participating in MNsure, provided that MNsure must enter into a data-sharing agreement or contract with the agency prior to sharing data. Minnesota Statutes, section 62V.06, subdivision 5.

MNsure has entered into data-sharing agreements with other state agencies and federal partners to carry out exchange functions, with health insurance carriers to transmit enrollment information and with contractors to perform work on behalf of MNsure. If a MNsure participant seeks to share information with a designee, MNsure has a standard consent form that may be used.

Conclusion

Going forward, MNsure's priorities will continue to be focused on improving the consumer experience. MNsure will continue open dialogue with partners and stakeholders to maintain transparency and accountability. With respect to MNsure's overarching goal—reducing the uninsured in Minnesota—it has been a great success. More than 95 percent of Minnesotans are now insured. MNsure will continue to build on this early success.

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